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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JULIE BARFUSS, et al..

Plaintiffs,

v.

LIVE NATION ENTERTAINMENT,
INC., TICKETMASTER L.L.C.,
STADCO LA, LLC as DOE 1, and
DOES 2 through 10, inclusive,

Defendants.

Case No. 2:23-cv-01114-GW-DTBx

JOINT STIPULATION SETTING DEADLINES FOR FURTHER AMENDED COMPLAINT AND BRIEFING SCHEDULE

[Civil Local Rule 7-1]

Assigned to: Honorable George H. Wu

1 Defendants Ticketmaster L.L.C. and Live Nation Entertainment, Inc.
2 (together, “Defendants”) and Plaintiffs Julie Barfuss et al. (“Plaintiffs”) (together,
3 the “Parties”) hereby stipulate and agree, through their undersigned counsel and
4 pursuant to Local Rule 7-1, to deadlines for Plaintiffs’ Fifth Amended Complaint
5 and Defendants’ anticipated Motion to Dismiss Plaintiffs’ Fifth Amended
6 Complaint, subject to the approval of the Court. In support of this Joint Stipulation,
7 the Parties state as follows:

8 1. On July 14, 2025, Plaintiffs filed a Fourth Amended Complaint. ECF
9 No. 168.

10 2. On November 24, 2025, the Court dismissed claims four, five, and six
11 in the Fourth Amended Complaint, without leave to amend; dismissed claim seven
12 in part, with leave to amend; and sustained claims one, two, three, and eight (and,
13 as to claim eight, for injunctive relief only). ECF No. 182.

14 3. Defendants’ deadline to answer the Fourth Amended Complaint is
15 currently December 8, 2025. *See Fed. R. Civ. P. 15(a)(3).*

16 4. Plaintiffs intend to file a Fifth Amended Complaint, which will further
17 amend part of the dismissed claim seven.

18 5. Due to the holidays and obligations in other cases, Plaintiffs have
19 requested several weeks to file their Fifth Amended Complaint.

20 6. The Parties have conferred and agreed to the following schedule for
21 Plaintiffs’ Fifth Amended Complaint and Defendants’ anticipated Motion to Dismiss
22 Plaintiffs’ Fifth Amended Complaint, subject to the approval of the Court:

23 a. Plaintiffs shall file their Fifth Amended Complaint by
24 December 31, 2025;

25 b. Defendants shall file their Motion to Dismiss the Fifth Amended
26 Complaint by January 21, 2026;

27 c. Plaintiffs shall file their Opposition to Defendants’ Motion to
28 Dismiss the Fifth Amended Complaint by February 11, 2026;

- 1 d. Defendants shall file their Reply in Support of their Motion to
2 Dismiss the Fifth Amended Complaint by February 25, 2026;
3 and
4 e. Any hearing on Defendants' Motion to Dismiss the Fifth
5 Amended Complaint shall be held on March 19, 2026, or as the
6 Court's calendar allows.

7 7. The parties have previously stipulated to extensions of time for
8 Defendants' response to the First Amended Complaint (ECF No. 10), for briefing
9 on arbitration issues and on Plaintiffs' Motion to Remand (ECF Nos. 26, 55, 69-70),
10 for Plaintiffs to further amend their complaint (ECF Nos. 126-27), for briefing on
11 Defendants' responsive motions to the Third Amended Complaint (ECF Nos. 133-
12 134; 146-149), and for briefing on the Fourth Amended Complaint (ECF Nos. 170,
13 171).

14 8. The Joint Stipulation will have no other effect on the schedule.
15 The Parties therefore agree and stipulate to the above dates.

16
17 Dated: December 5, 2025

Respectfully submitted,

LATHAM & WATKINS LLP

19 By: /s/ Timothy L. O'Mara

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L.L.C.*

1 Dated: December 5, 2025

Respectfully submitted,

2 GENGA & ASSOCIATES, P.C.

3 By: /s/ John M. Genga

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ATTESTATION

I am the ECF user whose identification and password are being used to file the foregoing Joint Stipulation Setting Deadlines for Further Amended Complaint and Briefing Schedule. Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I, Timothy L. O'Mara, attest that all other signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized such filing.

8 | Dated: December 5, 2025

/s/ Timothy L. O'Mara

Timothy L. O'Mara